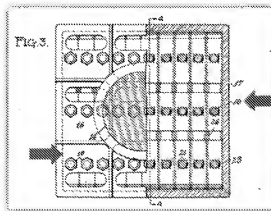


REMARKS

Claims 1, 2 and 4-7 were rejected as being unpatentable over Trudell in view of Pinson and Laskowski et al. Reconsideration and withdrawal of these rejections are respectfully requested, for the following reasons.

Claim 1, as amended, specifies that there are a plurality of elements arranged in array, each element of the plurality being supported on a cross rail and being rotatably moveable relative to the other elements in the array. Each element includes a support post extended from a first end thereof, and each support post associates with a corresponding internally threaded aperture in the cross rail upon which the element is supported, such that each of the elements is rotatable. The adjusting component in the form of a fork engages with the elements of the array to drive the element in rotation, upon rotation of the fork.

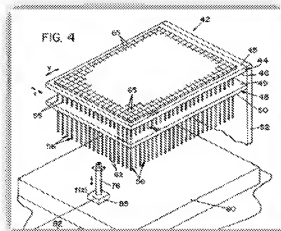
The Trudell reference teaches a plurality of elongated elements, and each element is retained in place by three threaded members which are locked in place by rotation of nuts (19), as shown below:



As these elements are each locked in place by a line of three bolts (18) fixed to each element, it is not possible for the elements of the Trudell to be rotated. Indeed, not only are there no

means disclosed by which to separate the elements from adjacent elements, but as each element is located by three bolts, there is no single center of rotation about which to rotate each element. This is clearly shown in figures 3 and 4, which show top and side views of the tool shown in figures 1 and 2.

The drive mechanism disclosed in Laskowski is very different from that disclosed in the present invention. In particular, the means disclosed in this patent for adjusting the height of the tool pins includes a server actuator (85) engaging with the bottom end of tool stems (6) and having a collet (76) that is linearly displaceable by the server actuator to displace the rod members (56) which terminate in flat end surfaces (65):



The collet (76) is rotatable so as to lock the elliptical shaped rod (56) in elliptically shaped holes (54, 55). This is quite different the presently claimed embodiment wherein, as claimed, a fork engages with the element itself, not with the threaded supped post, and movement of the element is achieved by means of the element and threaded support post rotating such that the threaded support post moves through the threaded aperture. Thus, the Laskowski reference would provide no

guidance to the person of ordinary skill in this art, to somehow modify the Trudell reference to achieve the claimed embodiments.

Indeed, even if one were to adapt Trudell in light of Pinson's threaded aperture and threaded support posts and Laskowski, the resultant device would still resemble that shown in Trudell, wherein the apertures provided in the plate (16) would be threaded and each of the bolts (18) would be reengaged by a motor driven collet to drive them up and down. This, however, is not equivalent to (and in no way teaches or suggests) the presently claimed embodiment invention, as a significant feature of the presently claimed embodiment is that the fork that rotates the elements is engageable with the element itself, not with a threaded support post thereof (or bolt, as referred to in the Trudell patent), which is a feature that is wholly unsuggested by the applied combination of references.

Accordingly, it is submitted that the claims 1, 2 and 4-7 are allowable over the applied combination of references. Reconsideration and withdrawal of the obviousness rejections applied thereto are respectfully requested.

The Office also rejected claims 3 and 8-14 under USC 103(a) as being unpatentable over Trudell in view of Pinson and further in view of Laskowski and further in view of Glasser. Reconsideration and withdrawal of these rejections are respectfully requested.

As noted above, Trudell in view of Pinson and in view of Laskowski does not render claim 1 unpatentable and claims 3 and 8-14 are also be patentable for the same reasons (and by virtue of their dependency upon a claim that is believed to be allowable).

Furthermore, claims 8 and 9 include the limitation that the fork comprises a head portion with spaced tines depending therefrom, wherein each of the tines includes a first section adjacent to the head portion having an inwardly facing surface that defines an adjustment area and a second

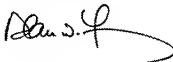
section, remote from the head portion, having inwardly facing guide surfaces and that the guide surface of the second section of the tines are convex. The applied references, even when combined with the Glasser reference, does not teach or suggest such an arrangement and, accordingly, claims 8 and 9 are believed to be patentable over Trudell in view of Pinson, Laskowski and Glasser.

Claim 13 includes a limitation in which the tines are recited to be moveable away from the element and are capable of being pivoted into engagement with the element. Claim 14 includes the limitation that tines are configured to include expandable faces. Neither of these recitations of structure is disclosed or suggested in the applied combination of references. Accordingly, these claims are also believed to be allowable over the applied art.

Allowable claim 15 has been re-written in independent form as suggested by the Examiner and is, therefore, also believed to be allowable.

Applicant believes that this application is now in condition for allowance. If any unresolved issues remain, please contact the undersigned attorney of record at the telephone number indicated below and whatever is necessary to resolve such issues will be done at once.

Respectfully submitted,



Date: December 11, 2009

By: _____
Alan W. Young
Attorney for Applicant
Registration No. 37,970

YOUNG LAW FIRM, P.C.
4370 Alpine Rd., Ste. 106
Portola Valley, CA 94028
Tel.: (650) 851-7210
Fax: (650) 851-7232